

**IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF DELAWARE**

DANNY M. SKINNER,)	
)	
Plaintiff,)	C.A. 07-384 SLR
)	
v.)	
)	
E.I. DU PONT DE NEMOURS AND COMPANY,)	
a Delaware corporation; E.I. DU PONT DE)	
NEMOURS AND COMPANY, Plan Administrator;)	
PENSION AND RETIREMENT PLAN; TOTAL)	
AND PERMANENT DISABILITY INCOME)	
PLAN; and SHORT TERM DISABILITY PLAN,)	
)	
Defendants.)	

DECLARATION OF KATHLEEN FUREY MCDONOUGH

I, Kathleen Furey McDonough, Esquire being duly sworn do hereby depose and say:

1. I am a member of the Bar of the State of Delaware and this Court, and a partner at the law firm of Potter Anderson & Corroon LLP ("PA&C"), counsel for Defendants E. I. du Pont de Nemours and Company, E. I. du Pont de Nemours and Company, Plan Administrator; Pension And Retirement Plan; Total And Permanent Disability Income Plan; and Short Term Disability Plan (collectively "Defendants") in this action.

2. Throughout the course of this action, I have been the partner responsible for billing Defendants for PA&C's legal services and expenses incurred in connection with this litigation.

3. I have reviewed the bills sent by PA&C to Defendants in this matter from July 20, 2007 through June 16, 2008. Those bills, and the underlying time entries of PA&C attorneys and personnel, indicate that PA&C has drafted pleadings, motions, briefs, and advised Defendants on strategy, among other things.

4. Attached hereto as Exhibit A is a true and correct copy of summary billing records for PA&C's work in this matter from July 20, 2007 through June 16, 2008. It is the practice of PA&C to keep computerized records of detailed time entries, and the billing summary

attached as Exhibit A is an accurate summary of those detailed time entries. In order to avoid unnecessarily burdening the Court, and to preserve attorney-client privilege and attorney work-product immunity, I have not submitted the voluminous detailed daily time entries; however, if the Court requires additional detail, I will make more detailed and/or redacted versions of PA&C's billing records available to the Court for *in camera* review, or as the Court otherwise requires. The background of the primary timekeepers who worked on this case is as follows:

Partners: Kathleen Furey McDonough: I received my undergraduate education at Saint Joseph's University (B.A. 1979). I received my legal education at Temple University School of Law (J.D. 1985). In 1985, I joined PA&C, where I became partner in 1993. I have had substantial litigation experience in the Delaware federal court. I was the attorney overseeing PA&C's handling of this case.

Associates: Sarah E. DiLuzio received her undergraduate education at the University of Delaware (B.A. 1998), and her legal education at Widener University School of Law (J.D. 2001). Upon graduation, Ms. DiLuzio was a law clerk for the Honorable Joseph J. Walsh for the Supreme Court of the State of Delaware for one year. In 2002, she joined PA&C as an associate in the litigation practice group, where she spends a significant amount of time working on employment litigation in the Delaware federal court. Ms. DiLuzio was the PA&C attorney primarily responsible for this matter.

Michael B. Rush received his undergraduate education at the University of Richmond (B.A. 1998), and his legal education at University of Virginia School of Law (J.D. 2007). After graduation and upon his successful completion of the Delaware State Bar examination, Mr. Rush joined PA&C as an associate in the litigation practice group.

5. The dollar value of the timekeepers' fees from PA&C for this matter through June 16, 2008 is \$12,665.97. The dollar value of expenses from PA&C for this matter through June 16, 2008 is \$97.10.

I declare under penalty of perjury under the laws of the United States of America that the foregoing is true and correct and that I executed this document on August 28, 2008 in Wilmington, Delaware.


KATHLEEN FUREY MCDONOUGH

EXHIBIT A

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Potter Anderson & Corroon LLP
Hercules Plaza
P. O. Box 951
Wilmington, DE 19899

Federal ID# 51-0080985

FOR LEGAL SERVICES RENDERED

BILLING PERIOD (Month/Year)	ATTORNEYS FEES	EXPENSES
July 2007	\$1,717.81	\$0
August 2007	\$1,900.34	\$8.50
September 2007	\$800.05	\$20.20
February 2008	\$52.20	\$0
May 2008	\$7,858.71	\$32.00
June 2008	\$336.86	\$36.40
TOTAL	\$12,665.97	\$97.10

TOTAL FEES AND EXPENSES = \$12,763.07

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